

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR COMMERCIAL PARTNERS, et al.,

Defendant.

800 HOYT LLC,

Intervening Interpleader Plaintiff /
Intervening Interpleader Counter-
Defendant,

v.

BRIAN WATSON, WDC HOLDINGS, LLC,
and BW HOLDINGS, LLC,

Interpleader Defendants

AMAZON.COM, INC. and AMAZON DATA SERVICES, INC.

Interpleader Defendants / Interpleader Counter-Plaintiffs.

**WATSON DEFENDANTS' MOTION TO SEAL
DOCUMENT RELATING TO MOTION TO VACATE INJUNCTION**

In accordance with the Agreed Protective Order in this case (Dkt. 55), Defendants WDC Holdings LLC, Brian Watson, Sterling NCP FF, LLC, Manassas NCP FF, LLC, and NSIPI Administrative Manager (“Watson Defendants”), respectfully request that the Court seal a document filed in connection with the Watson Defendants’ Motion to Vacate Injunction (Dkt.

696-6) because the deponent wishes to designate the entire transcript as “confidential.” In particular, the Watson Defendants request that the Court seal a copy of the Transcript of Danny C. Mulcahy, filed on April 25, 2022, as Exhibit 5 to the Declaration of Leah Regan-Smith in Support of the Watson Defendants’ Motion to Vacate Preliminary Injunction (Dkt. 696-1), which Declaration was attached to the Watson Defendants’ memorandum in support of their motion to vacate. (Dkt. 696).

Counsel for the Watson Defendants has requested that counsel for the deponent review the transcript and advise which portions of the transcript should be designated confidential, but has agreed in the meantime to move to seal the transcript in its entirety, until deponent’s counsel has had an opportunity to do so.

* * * * *

Dated: June 1, 2022

Respectfully submitted,

/s/ Stanley L. Garnett

Stanley L. Garnett (*pro hac vice*)
Amanda K. Houseal (*pro hac vice*)
Sara R. Bodner (*pro hac vice*)
Brownstein Hyatt Farber Schreck, LLP
410 17th Street, Suite 2200
Denver, CO 80202
Telephone: (303) 223-1100
Facsimile: (303) 223-1111
sgarnett@bhfs.com
ahouseal@bhfs.com
sbodner@bhfs.com

/s/ Jeffrey R. Hamlin

Jeffrey R. Hamlin (VA Bar No. 46932)
George R. Calhoun (*pro hac vice*)
James Trusty (*pro hac vice*)
IFRAH PLLC
1717 Pennsylvania Avenue NW, Suite 650
Washington, DC 20006
Telephone: (202) 524-4140
Facsimile: (202) 524-4141
jhamlin@ifrahlaw.com
george@ifrahlaw.com
jtrusty@ifrahlaw.com

*Counsel for WDC Holdings LLC, Brian
Watson, Sterling NCP FF, LLC, Manassas
NCP FF, LLC, and NSIPI Administrative
Manager*

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2022, I will electronically file the **Watson Defendants' Motion to Seal Document Relating to Motion to Vacate Injunction** using the Court's CM/ECF system, which will provide service to all counsel of record, and I will separately email *pro se* parties, as follows:

Elizabeth P. Papez
Patrick F. Stokes
Claudia M. Barrett
Michael R. Dziuban
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5306
epapez@gibsondunn.com
pstokes@gibsondunn.com
cbarrett@gibsondunn.com
mdziuban@gibsondunn.com

Veronica S. Moye
GIBSON, DUNN & CRUTCHER LLP
2001 Ross Avenue, Suite 2100
Dallas, TX 75201
vmoye@gibsondunn.com

Counsel for Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc.

Aaron G. McCollough
McGuireWoods LLP
77 West Wacker Drive, Suite 4100
Chicago, IL 60601
amccollough@mcguirewoods.com

Counsel for the Receiver

Casey Kirschner, *pro se**
635 N. Alvarado Lane
Plymouth, MN 55447
casey.kirschner@gmail.com

Alex Little
Rachel Friedman
Burr & Forman LLP
222 Second Ave. South, Suite 2000
Nashville, TN 37201
alex.Little@burr.com
rfriedman@burr.com

Counsel for Carleton Nelson and Cheshire Ventures

/s/ Jeffrey R. Hamlin
Jeffrey R. Hamlin

* I further certify that on June 1, 2022, I will mail the aforementioned materials via First-Class Mail to Mr. Kirschner at this address.